

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

NEHEMIAS MEJIA,

Plaintiff,

vs.

Civil No.:

**NBCUNIVERSAL MEDIA, LLC,
TELEMUNDO GROUP LLC,
TELEMUNDO MEDIA LLC,
TELEMUNDO MID-ATLANTIC LLC,
TELEMUNDO NETWORK GROUP LLC,
TELEMUNDO TELEVISION STUDIOS, LLC,
NBCUNIVERSAL DIGITAL ENTERPRISES LLC,
NBCUNIVERSAL DIGITAL ENTERPRISES
PRODUCTIONS LLC,
NBCUNIVERSAL DIGITAL ENTERTAINMENT LLC,
NBCUNIVERSAL DIGITAL LAB LLC,
NBCUNIVERSAL ENTERPRISE, INC.,
NBCUNIVERSAL INTERNATIONAL NETWORKS US
LLC,
NBCUNIVERSAL NETWORKS INTERNATIONAL
LATIN AMERICA LLC,
NBCUNIVERSAL NETWORKS INTERNATIONAL
SPANISH LATIN AMERICA LLC,
NBCUNIVERSAL PRODUCTION SERVICES LLC,
NBCUNIVERSAL SHARED SERVICES, LLC, and
NBCUNIVERSAL, LLC,**

Defendants.

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332(a)(1), 1441(a), and 1446, Defendants, NBCUniversal Enterprise, Inc., NBCUniversal, LLC, NBCUniversal Media, LLC, NBCUniversal Shared Services, LLC, NBCUniversal Digital Entertainment LLC, NBCUniversal Digital Enterprises LLC, NBCUniversal Digital Enterprises Productions LLC, NBCUniversal Production Services LLC, Telemundo Media LLC, Telemundo Group LLC, Telemundo Mid-Atlantic LLC, Telemundo Network Group LLC, Telemundo Television Studios, LLC, NBCUniversal Networks International

Spanish Latin America LLC, NBCUniversal Networks International Latin America LLC, NBCUniversal International Networks US LLC, and NBCUniversal Digital Lab LLC (“Defendants”), expressly reserving all rights to respond to this lawsuit, hereby file this Notice of Removal of the above-captioned action from the Circuit Court for Prince George’s County, Maryland, to the United States District Court for the District of Maryland. In support of this Notice, Defendants aver as follows:

Procedural History

1. On or about April 24, 2019, Plaintiff Nehemias Mejia (“Plaintiff”) filed an action captioned *Mejia v. NBCUniversal Media, LLC, et al.*, in the Circuit Court for Prince George’s County, Maryland, which was docketed as Case No. CAL19-14061. A true and correct copy of the Complaint, Summons, and Civil Case Information Report as served on Defendants is attached hereto as Exhibit A.

2. The Complaint, Summons, and Civil Case Information Report were served on Defendants on April 30, 2019.¹

3. Pursuant to 28 U.S.C. § 1446(b), Defendants are timely filing this Notice of Removal within thirty (30) days of service.

4. All of the Defendants have been served and consent to removal. None of the Defendants have answered, moved, or otherwise responded to the Complaint.

5. Copies of the process, pleadings, and orders that Defendants have received are attached. (Defendants are attaching all of the summons and, to avoid redundancy, one copy each of the Complaint and Civil Case Information Report.)

¹ Plaintiff delivered the Complaint, Summons, and Civil Case Information Report to the office of the Registered Agent for NBCUniversal Enterprise, Inc. While this is not sufficient service for many of the Defendants, the Defendants are accepting service as of that date.

Basis for Jurisdiction

6. This Court has original jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a) because there is complete diversity of citizenship among the parties and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

7. The United States District Courts would have had original jurisdiction over this matter under 28 U.S.C. § 1332 had the action been filed in federal court originally.

8. Pursuant to 28 U.S.C. § 1441(a), the United States District Court for the District of Maryland is the proper venue for removal jurisdiction because it embraces Prince George's County, Maryland, the place where this action is pending.

9. Pursuant to 28 U.S.C. § 1446(d), written notice of the filing of this Notice of Removal is being forwarded to counsel of record for Plaintiff, as well as to the Clerk of the Circuit Court of Prince George's County, Maryland. A true and correct copy of the Notice of Filing of Notice of Removal (without exhibits) is attached as Exhibit B.

10. By filing this Notice of Removal, Defendants do not waive any defenses that may be available.

Amount in Controversy

11. In the Complaint, Plaintiff seeks damages "in a sum to exceed \$75,000 in compensatory and punitive damages, plus interest and costs." *Id.* at 4 (*ad damnum* clauses).

Citizenship of the Parties

12. There is complete diversity between Plaintiff and Defendants, both at the time the lawsuit was filed and at the time of removal, as Plaintiff is a citizen of Maryland and Defendants are citizens of different states.

13. For purposes of diversity jurisdiction, Plaintiff is a citizen of the State of Maryland. *See* Ex. A (Complaint) at ¶ 1.

14. The Complaint names seventeen defendants. None of the Defendants are citizens of Maryland. As detailed below, the Defendants are citizens of Delaware, Pennsylvania, and Florida.

a. **NBCUniversal Enterprise, Inc.** is a citizen of Delaware as it is a Delaware corporation with its principal place of business in Delaware.

b. **NBCUniversal, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. NBCUniversal, LLC is a limited liability company organized under the laws of state of Delaware with its principal place of business in Pennsylvania. The citizenship of its members is as follows:

- i. The members of NBCUniversal, LLC are: Comcast DW Holding, Inc., a Delaware corporation with its principal place of business in Pennsylvania; NBCUniversal Enterprise, Inc., a Delaware corporation with its principal place of business in Delaware; SNL Entertainment Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; Comcast CCW Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; Comcast Navy Acquisition, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; Comcast Snap Holdings II, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; and Comcast Navy

Contribution, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.

- ii. The members of Comcast CCW Holdings, LLC are Comcast Navy Acquisition, LLC, and Comcast Snap Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.
- iii. The sole member of Comcast Navy Acquisition, LLC is Comcast Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
- iv. The members of Comcast Snap Holdings II, LLC are Comcast Navy Acquisition, LLC (above), and Comcast Snap Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.
- v. The members of Comcast Navy Contribution, LLC are: (i) E! Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; (ii) Versus Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; (iii) Comcast Contribution Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; (iv) Comcast CHC, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; (v) Comcast SportsNet Philadelphia Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; and (vi) Comcast SportsNet New England

Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.

- vi. The members of Versus Holdings, LLC are: (i) Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania; and (ii) E! Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.
- vii. The sole member of Comcast Contribution Holdings, LLC is Comcast Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
- viii. The sole member of Comcast CHC, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
- ix. The members of Comcast SportsNet Philadelphia Holdings, LLC are: (i) Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania; and (ii) Comcast Spectator Holding Company, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.
- x. The sole member of Comcast Spectator Holding Company, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
- xi. The members of Comcast SportsNet New England Holdings, LLC are: (i) Comcast SportsNet NE Holdings, Inc., a Delaware corporation with its

principal place of business in Pennsylvania; and (ii) CSNNE Partner, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.

xii. The sole member of CSNNE Partner, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.

c. **NBCUniversal Media, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

d. **NBCUniversal Shared Services, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

e. **NBCUniversal Digital Entertainment LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

f. **NBCUniversal Digital Enterprises LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company

organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

g. **NBCUniversal Digital Enterprises Productions LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Digital Enterprises LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

h. **NBCUniversal Production Services LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York. The citizenship of its members is as follows:

i. Its sole member is Universal Television LLC, a limited liability company organized under the laws of the state of New York with its principal place of business in California.

ii. The sole member of Universal Television LLC is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

i. **Telemundo Media LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. The citizenship of its members is as follows:

i. Its members are: (i) NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania; and (ii) NBC Subsidiary (WTVJ-

TV) LLC, a limited liability company organized under the law of the state of Delaware with its principal place of business in Florida.

- ii. The sole member of NBC Subsidiary (WTVJ-TV) LLC is NBC Stations Management II LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York.
- iii. The sole member of NBC Stations Management II LLC is NBC Stations Management LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York.
- iv. The sole member of NBC Stations Management LLC is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

j. **Telemundo Group LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Media LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

k. **Telemundo Mid-Atlantic LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Group LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

l. **Telemundo Network Group LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida,

and its sole member is Telemundo Media LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

m. **Telemundo Television Studios, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Network Group LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

n. **NBCUniversal Networks International Spanish Latin America LLC** is a citizen of Delaware, Pennsylvania, and Florida, because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. The citizenship of its members is as follows:

- i. Its members are: (i) NBCUniversal Global Networks Latin America LLC, a limited liability company organized under the laws of Delaware with its principal place of business in Florida; and (ii) Ole Universal Channels LLC, a limited liability company organized under the laws of Delaware with its principal place of business in Florida.
- ii. The sole member of NBCUniversal Global Networks Latin America LLC is Universal Studios Company LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.
- iii. The sole member of Universal Studios Company LLC is NBCU Acquisition Sub LLC, a limited liability company organized under the laws of Delaware with its principal place of business in New York.

- iv. The sole member of NBCU Acquisition Sub LLC is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.
- v. The members of Ole Universal Channels LLC are (i) Ole Communications, Inc., a Delaware corporation with its principal place of business in Florida; and (ii) Ole Communications Group (US), LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida.
- vi. The sole member of Ole Communications Group (US), LLC is a natural person with U.S. citizenship and a domicile in Florida.
- o. **NBCUniversal Networks International Latin America LLC** is a citizen of Delaware, Pennsylvania, and Florida, because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is NBCUniversal Networks International Spanish Latin America LLC, which, as described above, is a citizen of Delaware, Pennsylvania, and Florida.
- p. **NBCUniversal International Networks US LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in California. The citizenship of its members is as follows:
 - i. Its sole member is Universal City Studios Productions LLLP, a limited liability limited partnership organized under the laws of Delaware with its principal place of business in California.
 - ii. The partners of Universal City Studios Productions LLLP are: (i) VUE Holding LLC, a limited liability company organized under the laws of the

state of Delaware with its principal place of business in California; and (ii) VUE NewCo LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California.

iii. The sole member of VUE Holding LLC is VUE NewCo LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California.

iv. The members of VUE NewCo LLC are: (i) USI Entertainment LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California; and (ii) Universal Studios Company LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

v. The sole member of USI Entertainment LLC is Universal Studios Company LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

q. **NBCUniversal Digital Lab LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in California. The citizenship of its members is as follows:

i. Its sole member is NBCU Television Holding LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.

ii. The sole member of NBCU Television Holding LLC is Universal TV NewCo LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.

- iii. The members of Universal TV NewCo LLC are: (i) Universal City Studios Productions LLLP, which, as described above, is a citizen of Delaware and Pennsylvania; (ii) USANI Holding Company LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California; and (iii) New-U Studios LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.
- iv. The sole member of both USANI Holding Company LLC and New-U Studios LLC is Vue NewCo LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

15. By filing this Notice of Removal, Defendants do not waive any available defenses, rights, or objections. Defendants reserve the right to amend or supplement this Notice of Removal.

Dated: May 28, 2019

Respectfully submitted,

/s/ Chad R. Bowman
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Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on May 28, 2019, I caused a true and correct copy of the foregoing **Notice of Removal** to be served by first-class mail, postage prepaid, upon the following:

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May 28, 2019

/s/ Chad R. Bowman
Chad R. Bowman